## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI SOUTHERN DIVISION

UNITED STATES OF AMERICA

v. CRIMINAL NO. 1:22cr58-LG-RHWR

PATRICK DARNELL DANIELS, JR

## MOTION IN LIMINE CONCERNING JURY NULLIFICATION

The Government, by and through its undersigned counsel respectfully moves the Court to preclude Defendant from attempting to offer evidence that would invite jury nullification and/or making argument that would do the same. As discussed in further detail in the Government's contemporaneously filed Memorandum of Authorities, such evidence or argument is irrelevant, likely to confuse the jury, and otherwise inappropriate. Accordingly, the Government respectfully requests that this motion be granted.

Dated this the 13<sup>th</sup> day of July, 2022.

Respectfully submitted,

DARREN J. LaMARCA United States Attorney

Erica Rose
Assistant United States Attorney
OH Bar # 0087758

By: Jonathan D. Buckner

Jonathan D. Buckner Assistant United States Attorney MS Bar # 104146 1575 20<sup>th</sup> Avenue Gulfport, MS 39501 Ph: (228) 563-7275

Jonathan.Buckner@usdoj.gov

## **CERTIFICATE OF SERVICE**

I hereby certify that on this the 13th day of July, 2022, I caused to be filed the foregoing motion with the Clerk of the Court using the ECF system which sent notification of such filing to counsel of record.

Jonathan D. Buckner

Jonathan D. Buckner
Assistant United States Attorney